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**REMARKS**

Applicants' undersigned attorney thanks the Examiner for his comments. Applicants respectfully request reconsideration of this patent application, particularly in view of the above Amendment and the following remarks. Currently, Claims 1 and 3-22 are pending.

The present invention is directed to a method for sealing a freezer enclosure and a protective coating for a freezer enclosure. A freezer enclosure may be sealed by applying a screen including a plurality of opening on wall of the freezer enclosure, applying a polyurea coating to the screen, and solidifying the polyurea coating. The polyurea coating is applied to the screen in a sufficient quantity to coat the screen and permeate openings in the screen through to the wall. The screen is retained on the wall with a plurality of fasteners. The polyurea coating consists of two components, Component A and Component B. Component A, an isocyanate component, consists of a mixture of diphenylmethane diisocyanate, modified methylenediphenylene isocyanate (MDI) and methylenediphenylene isocyanate (MDI) homopolymer. Suitably, Component B, a polyamine component, consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.

**Amendments to the Specification**

The specification has been amended on page 11, lines 16 and 22 to correct a typographical error. Specifically, the term of "urethane" is properly replaced with the term "isocyanate." Support for this Amendment is found on page 10, lines 17-19.

**Amendment to the Claims**

Claims 1 and 3-22 have been examined with no claims allowed. Applicants request cancellation of Claim 17 without prejudice. Amended Claims 1, 3-7, 10, 15, 16, 20, 21 and 22 are included herein.

Claims 1, 10, 15 and 20 have been amended to recite that the screen is applied to the wall and retained on the wall with a plurality of fasteners. Support for this amendment is found on page 6, lines 15-19 and in original Claim 17.

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Claims 3, 10 and 20 have been amended to recite that the polyurea coating is a mixture consisting of a polyamine component and an isocyanate component. Support for this amendment is found on page 10, line 17-19.

Claim 4 has been amended to recite that the polyamine component of Claim 3 consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.

Claim 5 has been amended to recite that the isocyanate component of Claim 3 consists of diphenylmethane diisocyanate, modified methylenediphenylene isocyanate and methylenediphenylene isocyanate homopolymers.

Claims 6 and 7 have been amended to clarify that the method further comprising mixing and applying the two *components* under pressure, respectively.

Claim 15 has been further amended to recite a protective coating for a freezer enclosure having steel walls consisting of a screen, a plurality of fasteners retaining the screen on the walls of the freezer enclosure, and a cured polyurea coating consisting of a mixture of Component A and Component B wherein Component A consists of an isocyanate component and Component B consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.

Claim 16 has been amended to recite that Component B consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine and Component A consists of diphenylmethane diisocyanate, modified methylenediphenylene isocyanate and methylenediphenylene isocyanate homopolymers.

Claims 21 and 22 have been amended to recite that Component B consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.

No new matter has been added by this Amendment. The number of independent claims in this application remains the same. The total number of claims

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in this application is decreased by 1. Therefore, no additional claim fee is due. Should additional claim fees be required, Applicants' undersigned attorney authorizes that such fees may be charged to Deposit Account No. 19-3550.

#### **Interview Summary**

Applicants' undersigned attorney and Examiner Sing P. Chan conducted a telephone interview on 08 November 2005. Applicants' undersigned attorney would like to thank the Examiner for his courtesy during the interview.

Applicants' undersigned attorney and the Examiner discussed the "consisting essentially of" language with regard to Component B in claims 15, 21 and 22 in view of the Zimmerman reference. The Examiner indicated that the phrase "consisting essentially of" phrase left the claims open.

Applicants' undersigned attorney and the Examiner further discussed the foam material of the Yuuzaborou reference and the function of the disclosed foaming action during application.

No agreement was reached regarding allowability of any of the claims currently under examination.

#### **Claim Rejections - 35 USC §103**

The rejection of Claims 1, 10, 15, 17 and 20 under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication No. 54-123172 to Yuuzaburou et al. in view of U.S. Patent 6,383,608 to Burkett et al. is respectfully traversed.

Yuuzaburou discloses a resin foam reinforcing member formed by coating a tackifier on at least one surface of a meshed cloth body which is embedded in polyurethane foam. The tackifier coated mesh is pressure bonded to a wall surface and a urethane solution is applied. As the urethane flows to the back surface of the cloth body, the mesh is pulled off from the wall surface by the foaming pressure of the urethane and embedded in the urethane layer to form the reinforced foam. (See, page 3, last paragraph through page 4, first full paragraph of the English translation.)

Claims 1, 10, 15 and 20 recite a method for sealing a freezer enclosure by applying a screen to a wall of the freezer enclosure which is retained on the wall with a plurality of fasteners and a refrigeration device including a screen retained on at least one wall of the device with a plurality of fasteners, respectively. In contrast, Yuuzaburou discloses applying a tackifier to a mesh cloth which is pressure bonded to

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a wall surface. Yuuzaburou teaches away from using fasteners to adhere or apply a screen to a surface because it relies on release of the mesh body from the surface during application of the urethane solution to embed the mesh cloth in the foam and thereby form a reinforced foam body. Thus, Yuuzaburou does not disclose or suggest using a plurality of fasteners to retain a screen to a wall of a freezer enclosure or refrigeration device.

Claims 10, 15 and 20 recite a method for sealing a freezer enclosure by applying a polyurea coating consisting of a polyamine component and an isocyanate component, and a refrigeration device including a polyurea coating consisting of a polyamine component and an isocyanate component, respectively. As the Examiner notes, Yuuzaburou is silent as to coating the mesh cloth with a polyurea coating. However, Burkett does not overcome the deficiencies of Yuuzaburou.

Burkett discloses a method for forming a foam product with enhanced fire resistance suitable for use as a roof covering material, roof shingles or panels, wall panels and wood substitutes for furniture. The foam may be formed by a molding process using a foamed plastic material such as polyurethane, polyuria (*sic*) and other polymeric foams.

A foam or foamed plastic necessarily includes gas or air introduced during manufacture to form a cellular matrix. Claims 10, 15 and 20 requires that the polyurea coating consists of a polyamine component and an isocyanate component. Claims 10, 15 and 20, thus preclude the presence of gas or air within in the polyurea coating. Furthermore, polyurea coating formulations and polyurea foam formulations are generally recognized in the art as separate materials. For example, U.S. Patent 5,189,075 to Zimmerman et al., which was cited by the Examiner, discloses polyurea elastomers that may be sprayed and foams comprising gas and polyurea (Col. 2, lines 5-11).

Therefore, Yuuzaburou in view of Burkett does not disclose or suggest a polyurea coating consisting of a polyamine component and isocyanate component which is applied to a screen retained on a wall with a plurality of fasteners. Furthermore, regarding Claim 15, neither Yuuzaburou nor Burkett disclose a cured polyurea coating consisting of two components wherein Component A consists of an isocyanate component and Component B consists of N,N' dialkylamino-

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diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.

For at least the reasons given above, Applicants respectfully submit the Yuuzaburou in view of Burkett, does not disclose or suggest Applicants' invention as recited in Claims 1, 10, 15 and 20. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

The rejection of Claim 18 and 19 under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication No. 54-123172 to Yuuzaburou et al. in view of U.S. Patent 6,383,608 to Burkett et al. as applied to Claim 15 above, and further in view of Japanese Publication No. 57-104747 to Toshio is respectfully traversed.

As discussed above, Yuuzaburou in view of Burkett, does not disclose or suggest a cured polyurea coating consisting of two components wherein Component A consists of an isocyanate component and Component B consists of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine which is applied to a screen retained on a wall with a plurality of fasteners.

Toshio does not overcome the deficiencies of Yuuzaburou and Burkett. Toshio, similar to Yuuzaburou and Burkett, disclose forming a foam structure of a thermosetting resin. The resin materials of Toshio necessarily include air or gas introduced during formation of the foam structure. Thus, Toshio does not disclose or suggest a cured polyurea coating consisting of a mixture of an isocyanate component (Component A) and a polyamine component (Component B).

For at least the reasons above, Claim 15 is patentable over Yuuzaburou in view of Burkett, and further in view of Toshio. Because Claims 18 and 19 depend from Claim 15, these claims are also patentable. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

The rejection of Claims 3-8, 11-13, 16, 21 and 22 under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication No. 54-123172 to Yuuzaburou et al. in view of U.S. Patent 6,383,608 to Burkett et al. as applied to

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Claims 1 and 15 above, and further in view of U.S. Patent 5,189,075 to Zimmerman et al. is respectfully traversed.

As discussed above Yuuzuburou in view of Burkett does not disclose or suggest using a plurality of fasteners to retain a screen on a wall of a freezer disclosure or refrigeration device as recited in Claims 1, 10 and 15. Additionally, as discussed above, Yuuzuburou in view of Burkett does not disclose or suggest a polyurea coating consisting of a polyamine component and an isocyanate component, as recited in Claim 10, and furthermore, does not disclose or suggest a polyamine component consisting of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine as recited in 15.

Zimmerman discloses a polyurea elastomer, suitable for use as a spray coating, which is the product of polyisocyanate reacted with di- and/or tri-functional polyoxyalkylene polyamine and low molecular weight, polyoxyalkylene polyamine chain extender having at least four functional groups including two or more amino groups (Col. 2, lines 5-10). Zimmerman does not disclose or suggest using a plurality of fasteners to retain a screen on a wall of a freezer enclosure which is coated with a polyurea coating as required by Claims 1, 10 and 15.

Additionally, Claims 15, 21 and 22 recite a polyurea coating consisting of a mixture of an isocyanate component (Component A) and a polyamine component (Component B) consisting of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine. In contrast Zimmerman discloses a polyurea elastomer that includes a low molecular weight polyoxyalkylene polyamine chain extender such as an aminated propoxylated  $\alpha$ -methyl glycoside to provide improved physical properties. Thus, Yuuzaburou in view of Burkett and further in view of Zimmerman does not disclose or suggest the protective coating recited in Claim 15.

Claim 16 recites that the isocyanate component (Component A) consist of diphenylmethane diisocyanate, modified methylenediphenylene isocyanate and methylenediphenylene isocyanate homopolymers and the polyamine component (Component B) consists of N,N' dialkylamino-diphenylmethane;

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diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine.. Zimmerman does not disclose or suggest a polyurea coating consisting of an isocyanate component consisting of recited MDI polymers and the recited polyamine compounds.

Furthermore, one of ordinary skill in the art at the time the invention was made would not be motivated to modify Yuuzaburou to include the spray polyurea elastomer of Zimmerman because prior art reference cannot be modified in a manner which makes it unsuitable for its intended purpose or use. As discussed above Yuuzaburou discloses a foam body which is formed by the foaming action of a foam solution which embeds a screen within the foam. Zimmerman does not disclose or suggest that the spray formulations would provide such foaming action upon application and further distinguishes spray polyurea elastomers from foam elastomers.

For at least the reasons above, one having ordinary skill in the art at the time the invention was made would not be motivated to combine the disclosures of the Yuuzaburou, Burkett and Zimmerman references to prepare a protective coating for a freezer enclosure including a screen retained on a wall of the freezer with a plurality of fasteners and a polyurea coating as recited in Claim 1, to prepare a protective coating for a freezer enclosure including a screen retained on a wall of the freezer with a plurality of fasteners and a polyurea coating consisting of a mixture of an isocyanate component and a polyamine component as recited in Claim 10, or a protective coating consisting of a screen retained on a wall of a freezer enclosure with a plurality of fasteners, and a polyurea coating consisting of an isocyanate component (Component A) and a polyamine component (Component B) consisting of N,N' dialkylamino-diphenylmethane; diethyltoluenediamine; poly(oxy(methyl-1,2-ethanediyl)), Alpha-(aminomethylethyl)-omega-(2-aminomethylethoxy)-; and glyceryl poly(oxypropylene) triamine as recited in Claim 15.

For at least the reasons above, Applicants respectfully submit that Claim 1, 10 and 15 are patentable over the Yuuzaburou in view of Burkett and further in view of Zimmerman. Because Claims 3-8 depend for Claim 1, Claims 11-13 depend from Claim 10 and Claims 16, 21 and 22 depend from Claim 15, Applicants

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respectfully submit that these claims are also patentable. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

The rejection of Claim 9 under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication No. 54-123172 to Yuuzaburou et al. in view of U.S. Patent 6,383,608 to Burkett et al. as applied to Claim 1 above, and further in view of the BlastMaster web page is respectfully traversed.

As discussed above, neither Yuuzaburou nor Burkett, alone or in combination, disclose or suggest a method for applying a protective coating to a wall of a freezer enclosure as recited in Claim 1. The Blastmaster web page does not overcome the deficiencies of Yuuzaburou and Burkett.

The Blastmaster web page discloses the use of sodablasting for cleaning various surfaces. The Blastmaster web page, however, is silent as to methods for sealing a freezer enclosure as recited in Claim 1 of the present invention. Thus, Yuuzaburou alone or in combination with Burkett and/or the BlastMaster web page does not disclose or suggest a method for sealing a freezer enclosure as recited in amended Claim 1.

Therefore, Applicants respectfully submit that amended Claim 1 is patentable over Yuuzaburou in view of Burkett and further in view of the BlastMaster web page. Because Claim 9 depends from Claim 1 Applicants respectfully submit that this claim is also patentable. Accordingly, Applicants respectfully request withdrawal of this rejection.

The rejection of Claim 14 under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication No. 54-123172 to Yuuzaburou et al. in view of U.S. Patent 6,383,608 to Burkett et al. as applied to Claim 10, and further in view of Japanese Publication No. 07-099949 to Mitsuhiro is respectfully traversed.

As discussed above, neither Yuuzaburou nor Burkett, alone or in combination, disclose or suggest a method for applying a protective coating to a wall of a freezer enclosure as recited in Claim 10. The Mitsuhiro reference does not overcome the deficiencies of Yuuzaburou and Burkett.

The Mitsuhiro reference discloses a freezer including an apparatus for washing and sterilizing the freezer wherein the freezer is washed with a washing liquid and sterilized by steam blown from steam pipes. The Mitsuhiro reference is

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silent as to how such a freezer may be sealed with a protective coating. Thus, Yuuzaburou alone or in combination with Burkett and/or Mitsuhiro does not disclose or suggest a method for sealing a freezer enclosure as recited in Claim 10.

For at least the reasons above, Applicants respectfully submit that Claim 10 is patentable over Yuuzaburou in view of Burkett, and further in view of Mitsuhiro. Because Claim 14 depends from Claim 10, Applicants respectfully submit that this claim is also patentable. Accordingly, withdrawal of this rejection is respectfully requested.

#### Conclusion

Applicants believe that this case is now in condition for allowance. If the Examiner feels that any issues remain, then Applicants' undersigned attorney would like to discuss the case with the Examiner. The undersigned can be reached at (847) 490-1400.

Respectfully submitted,

  
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